

NOV 21 2005

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

JAMES D. LIVINGSTONE  
Assistant Attorney General  
Commonwealth of the Northern Mariana Islands  
Office of the Attorney General-Civil Division  
2<sup>nd</sup> Floor, Hon. Juan A. Sablan Memorial Bldg.  
Caller Box 10007  
Saipan, MP 96950

Attorney for: Defendants

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW,

Case No. 05-0027

Plaintiff,

vs.

**EX PARTE MOTION EXTENDING TIME  
UNDER LOCAL RULE 7.1.h.3(b) AND  
FED. R. CIV. P. 6 (b); APPLICATION FOR  
INCREASE OF TIME UNDER LOCAL  
RULE 7.1.h.2**

COMMONWEALTH OF THE NORTHERN  
MARIANA ISLANDS, NICOLE C. FORELLI,  
WILLIAM C. BUSH, D. DOUGLAS COTTON,  
L. DAVID SOSEBEE, ANDREW CLAYTON,  
UNKNOWN AND UNNAMED PERSONS IN  
THE CNMI OFFICE OF THE ATTORNEY  
GENERAL, ALEXANDRO C. CASTRO, JOHN  
A. MANGLONA, TIMOTHY H. BELLAS,  
PAMELA BROWN, ROBERT BISOM, AND  
JAY H. SORENSEN,

Defendants.

**CERTIFICATE PURSUANT TO LOCAL RULE 7.1.h.3(b)**

As undersigned counsel, James D. Livingstone, certifies as follow:

a. The address and phone number of Plaintiff Bradshaw, who is without counsel, as listed on his

1 Amended Complaint is:

2 P.O. Box 473  
3 1530 Trout Creek Road  
4 Calder, Idaho 83808  
5 Telephone: 208-245-1691

6 Defendants Nicole Forelli, William C. Bush, D. Douglas Cotton, and Pamela Brown are  
7 represented by the Commonwealth of the Northern Mariana Islands Attorney General's Office whose  
8 address and relevant numbers are:

9 Office of the Attorney General-Civil Division  
10 2<sup>nd</sup> Floor, Hon. Juan A. Sablan Memorial Bldg.  
11 Caller Box 10007  
12 Saipan, MP 96950  
13 Telephone: 670-664-2341  
14 Facsimile: 670-664-2349

15 Defendant Jay Sorensen's address and relevant numbers are:

16 c/o Shanghai  
17 Post Office Box 9022  
18 Warren, MI 48090-9022  
19 Telephone: (86) 21 5083-8542  
20 Facsimile: (86) 21 5083-8542

21 The addresses of any other Defendants are unknown at this time.

22 **FACTS SHOWING EXISTENCE AND NATURE OF THE CLAIMED EMERGENCY  
OR REASON FOR EX PARTE APPLICATION**

Defendants Nicole Forelli, William C. Bush, D. Douglas Cotton, and Pamela Brown (hereafter collectively "Defendants") request that this Court extend and enlarge time to respond to Plaintiff's Amended Complaint. Specifically, Defendants seek an enlargement up to and including December 23,

1 2005 to file a dispositive motion or responsive pleading to the Plaintiff's Complaint.

2 Some, if not most, of the Defendants have been served improperly. As a result, Motions to  
3 Quash for Defective Service will be filed with this honorable Court on their behalf in the near term.  
4 While these service matters are being sorted out, Defendants wish to proceed in an abundance of  
5 caution and move to enlarge time for filing a responsive dispositive motion under Fed. R. Civ. P. 12  
6 (b) (6).

7 Plaintiff Bradshaw's complaint is eighty-one pages long and contains numerous causes of  
8 action under an exhaustive list of federal civil and criminal statutes, including, among others, the  
9 Racketeer Influence Corrupt Organizations Act, the Immigration Reform and Control Act and several  
10 Federal Civil Rights causes of action. Crafting an adequate response to all of Plaintiff Bradshaw's  
11 numerous allegations on behalf of the four Defendants is quite an undertaking. Accordingly,  
12 Defendants need additional time to properly address Plaintiff's allegations and file a responsive  
13 pleading or dispositive motion.

14 Currently, the deadlines for Defendants to respond individually vary from November 22, 2005  
15 to December 7, 2005. A single deadline for these Defendants will preserve judicial resources as their  
16 motions will raise many of the same issues.

17  
18 **PLAINTIFF BRADSHAW WAS NOTIFIED, BUT HAS YET TO BE SERVED WITH  
THIS MOTION**

19 Plaintiff Bradshaw, appearing *pro se*, does not oppose this motion and agrees to enlarge time  
20 up to and including December 23, 2005. Because Mr. Bradshaw resides in Idaho, Defendants were  
21 unable to obtain a stipulation memorializing this agreement in a timely manner.  
22

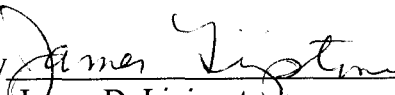
1                   **APPLICATIONS TO INCREASE TIME PURSUANT TO LOCAL RULE 7.1.h.2**

2           Based upon the facts set forth herein, Defendants make this application to increase time and  
3 state: a) no other extensions of time have been sought in this matter, b) the reasons for this extension  
4 are set forth herein, and c) granting this extension would not effect any scheduled dates.

5           WHEREFORE, based upon the foregoing, Defendants respectfully request that this Court grant  
6 Defendants Ex Parte Motion Extending Time and enter an Order extending Defendants' deadline for  
7 filing a dispositive motion or responsive pleading to the Plaintiff's Complaint until December 23,  
8 2005.

9                                   Respectfully submitted,

10                                  CNMI ATTORNEY GENERAL'S OFFICE  
11                                  ON BEHALF OF DEFENDANTS FORELLI,  
12                                  BUSH, COTTON AND BROWN

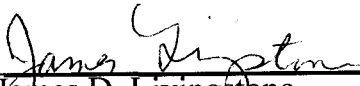
13                                  By   
14                                   James D. Livingstone  
15                                   Assistant Attorney General  
16                                   Office of the Attorney General  
17                                   2<sup>nd</sup> Floor, Juan A Sablan Memorial Bldg.  
18                                   Caller Box 10007  
19                                   Saipan, MP 96950  
20                                   670-664-2341  
21  
22

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that a copy of the foregoing was served, via U.S. Mail, on the 21<sup>st</sup> day of November, 2005, upon the following:

Robert D. Bradshaw  
Plaintiff, Pro Se  
P.O. Box 473  
1530 W. Trout Creek Road  
Calder, ID 83808

Jay Sorensen  
c/o Shanghai  
Post Office Box 9022  
Warren, MI 48090-9022  
Telephone: (86) 21 5083-8542  
Facsimile: (86) 21 5083-8542

  
\_\_\_\_\_  
James D. Livingstone  
Assistant Attorney General